

Attachment 1b

No

2. On Companies House the only Director of Cumbrian Recycling Limited is listed as CRL Logistics Ltd (Co No:11551122) which seems to be a parent company – explain the relationship between the two companies

NOTE. We are Cumbria Recycling NOT Cumbria Recycling

- Cumbria Recycling Limited (“CRL”) is Company Number 05507680 and is registered in England and Wales.

The company you have noted CRL Logistics Ltd Company Number 11551122 was incorporated on 4/9/2018.

- CRL is listed as a corporate director of the logistics company and this maybe where the confusion has arisen.
- CRL Logistics Ltd was setup in contemplation of another business venture which did not prove to be a long-term option.
- For the avoidance of doubt our application relates to Company Number 05507680, which is Cumbria Recycling Limited.

3. Are there any other businesses (such as companies, partnerships, individuals, charities etc) that share the Cumbria Recycling Limited site? If so, please provide details of each business and their relationship to your company.

Yes. CRL leases two units in the top yard to a company: Nuclear Manufacturing and Site Services Limited, Company Number 08030373. The Top and Bottom yards are separated by an internal boundary fence. The relationship is that of Landlord and Tenant.

4. During the site visit recently done by our Field team there was a consultant (Michael Robertson) present – has he been involved in preparing the AATF application?

No; The application has been prepared by myself.

5. Has there been anyone else involved in preparing the application apart from yourself – if so, please give their details.

No.

6. Please outline the process used to determine whether an item is obligated or non obligated – please demonstrate an understanding of the difference between the two.

- Obligated waste (Household) is collected on behalf of the PCS.
- Non-obligated waste is a B2B (Not Household) collection.
- Evidence is only issue on Obligated Household waste.
- The only exception to this would be non-obligated waste which can be obviously classed as dual use e.g. A Undercounter Fridge collected as B2B (Non-Obligated) that is suitable for domestic use.
- Evidence in this case would be offered to a PCS to help them achieve their targets.

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7. What Scheme arrangements do you have?

REPIC PCS (WEE/MP3638PE/SCH) and Recycling Lives PCS (WEE/XP3838PX/SCH)

8. Please expand on the process used to determine whether the WEEE is B2B or B2C

- B2C household waste is collected on behalf of a PCS, usually from a HWRC and is therefore obligated.
- B2B Non-Household is not collected on behalf of a PCS

9. Can you describe the process used to determine whether the WEEE is B2B or B2C? Please provide details of the process used to determine whether the WEEE is B2B or B2C.

- Employees are informed on B2B collections before they depart from the warehouse, this allows the driver to segregate each collection if multiple collections are required.
- Training is provided for new members of staff as part of their induction.
- Regular in-house refresher training is provided to all existing staff normally by means of Toolbox Talks based on the WAMITAB waste awareness training.
- Plus; regular spot checks are carried out by management to confirm that all staff have a good understanding of the process.

10. If any batteries are found in the WEEE collected, please outline what is done with them – and the details of the sites they are sent to for recycling.

- Any batteries found are separated out and they are then sent onto a battery recycling operator, such as Recycling Lives Ltd at Workington.
- We deduct the weight of all batteries from the weight received for evidence purposes.

11. You say the WEEE collected is no older than 9 years old and so does not contain POPs – how do you ensure this is the case and what is the process if POPs are found?

- CRL collect all WEEE regardless of age, however we only select for reuse appliances which are under 9 years of age.
- This ensures that all appliances, designated for reuse were manufactured well outside the deadline put in place in 2009 to stop the use of POP's in manufacturing.

12. Outline how you are able to meet the R & R targets set out in the WEEE Regulations

- The Recycle & Recovery data is derived from external recyclers designated by the PCS.
- CRL do not undertake any Material Recycling onsite as CRL is primarily a Reuse Organisation.
- The R&R data for Reuse and Recovery of parts is contributed to the overall R&R targets.

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13. From the S & I plan it seems that you do some manual dismantling – please state which categories and how many staff and work benches are dedicated to this activity.

- Category 3. One full time member of staff (supplemented with additional staff resource as dictated by demand). There are 3 benches.
- Category 1. Two full time members of staff (supplemented with additional staff resource as dictated by demand). There are 22 testing points.

14. In the S & I Plan you state that if an item fails the reuse assessment, then the item is stripped for parts and the remnants are sent to another site for recycling – this is classed as treatment – please fill in the treatment part of the S & I Plan. As the first receiving AATF for these items evidence notes cannot be raised by the AATF you send them to as that would be double counting.

- As the first receiving AATF we are aware that downstream AATF recyclers cannot issue evidence on any waste CRL forward to them.
- This is contract bound with the PCS who designate ALL downstream recyclers or AATF's CRL forwards waste to.
- No evidence is issued on the extracted parts designated for reuse, as parts alone falls outside the WEEE Directive.
- However; these parts are still classed as waste until they are tested and reused within a whole appliance.
- **All testing for reuse is outlined in PASS141.**

15. During the Field Audit done a few weeks ago the report states that you store fridges on the back of a lorry

S & I Plan amended.

16. Regarding items that are tested for re-use – please list the tools used to test whether they can be put forward for reuse.

- o All testing for reuse is undertaken and completed to the PASS141 standard.
- o The tools used as part of the process would be those required to complete a satisfactory PAT test of the appliance.
- o CRL only test for reuse items that are still in demand by low-income local families.

In respect of testing an item to ascertain its suitability for reuse, it would firstly be subject to a visual inspection to ensure it was visibly suitable to be resold, then it would be PAT Tested. Portable Appliance Testing (PAT Testing) is a process used to examine electrical appliances and equipment to ensure they are safe for use. It involves a visual inspection of equipment and any associated cables and plugs and a series of electrical tests. The primary aim of PAT Testing is to prevent electrical accidents in the workplace and other environments, ensuring that appliances adhere to relevant safety standards. In essence, the core purpose of PAT Testing is to create and maintain a safe environment by ensuring that electrical equipment is in a safe operating condition.

Specialist PAT testing equipment is used for this process.

If the item passes all of the above it is then put on an extended test relevant to its purpose i.e. washing machines will be put through a number of cycles, TV's will be put on extended test, dryers will be put through a number of cycles, all as per the WRAP PAS:141 testing procedures.

During the above testing cycle should any component within the appliance be found to be faulty or unsatisfactory then it is repaired or replaced and the test resumed until such time as it is passed satisfactorily.

A number of tools can be used in this process including screwdrivers, socket sets, spanners, multi meter, drill, air compressor (for the removal of dust and debris internal to the appliance) etc. This list is by no means exhaustive, but any tools found in a typical toolbox can be used to undertake the work required to refurbish appliances.

Manual disassembly of appliances utilises the same/similar tools as though described above. The tools used would be those that would be found in a typical toolbox.

In both of the above instances there are no tools required which might be considered to be specialist in nature.

WEEE:

In respect of our understanding of the difference between obligated and non-obligated WEEE:

Obligated WEEE

- Definition: Obligated WEEE refers to waste electrical and electronic equipment that is collected and processed under the responsibility of a Producer Compliance Scheme (PCS).*
- Collection: This type of WEEE is typically collected from designated collection facilities (OFRs), distributors, or directly from consumers by a PCS.*
- Evidence: Approved Authorised Treatment Facilities (AATFs) and Approved Exporters (AEXs) can issue evidence notes for obligated WEEE, which serve as proof of proper treatment, recycling, or reuse.*
- Examples: Household WEEE collected by local authorities, retailers, or manufacturers under take-back schemes, and non-household WEEE collected by a PCS from businesses.*

Non-Obligated WEEE

- *Definition: Non-obligated WEEE refers to waste electrical and electronic equipment that is not collected or processed under the responsibility of a 9cs.*

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- **Collection: This** type of *WITH* is received by AATFS or AEs from sources other than a POS, such as direct collections from businesses or individuals **without** a PCS agreement.
- *evidence: AATFS and AEs cannot issue evidence notes for non-obligated W8T8, meaning it does not count towards the recycling targets set by the N/EEE regulations.*
- **Examples: WHEN collected independently by businesses or individuals without involving a PCS.**

In summary, the key difference lies in the responsibility and **compliance with the WEEE regulations**. Obligated WEEE is managed through a POS and can be documented for **regulatory** compliance, while non-obligated WEEE is not **managed** through a PCS and cannot be used **to meet regulatory** targets.

19. In the original S & I plan that was submitted with the Application for 2025 it was stated
"All household and dual use WEEE collected from schools and local businesses is on behalf of the Recycling Lives Producer Compliance Scheme" however this was changed in the updated version submitted after the first round of queries I sent out to: "All non-obligated dual use (B2B) WEEE collected from non-HWRC sites, are offered to REPLIC Producer Compliance Scheme & Recycling Lives Producer Compliance Scheme".

Please clarify what is meant by non-obligated because as you are offering this to PCSs REPLIC and Recycling Lives it becomes obligated.

In the above we were **seeking to set out how we approach the** issue of dual use WEEE. WEEE not collected **under the PCS** is by definition when it is initially collected **non-obligated until** such time as **collection and examined. B2B WEEE which is** deemed to be dual use **e.g. domestic** waste can then be offered to PCSs which if **accepted is** then deemed to be and reclassified as obligated

20. Also please state whether you collect from any other sources than HWPCs and list them, as initially there is mention of schools and local businesses and then that has been removed and replaced with the term non-obligated, but as we have established once it is offered to a PCS it becomes obligated

I refer you to Question 6 (below) of my initial set of queries as answered by Chris in the document 'AATF Responses to Email Questions' — my notes are in red here

"Please outline the process used to determine whether an item is obligated or non-obligated — please demonstrate an understanding of the difference between the two. "

- Obligated waste (Household) is collected on behalf of the PCS.
- Non-obligated waste is a B2B (Not Household) collection. — it is not necessarily the case that all B2B is non-obligated. — All B2B waste is at the point of collection deemed

to be non-obligated. It is only after collection and examination that if certain items are deemed to be dual use e.g. household fridges can they be offered to the PCS and if accepted by them they are then classified as obligated.

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21. In respect of CRL all B2B which we collect is at point of collection non-obligated as we do not collect B2B at the request of a PCS. Therefore, all household and dual use appliances collected under B2B non obligated status is accumulated and offered to either of the PCS's for the purchase of evidence. If purchased by the PCS it then becomes obligated.

- Evidence is only issue on Obligated Household waste.
- The only exception to this would be non obligated waste which can be obviously classed as e.g.
A Undercounter Fridge collected as B2B (Non-Obligated) that is suitable for domestic use.
- Evidence in this case would be offered to a PCS to help them achieve their targets